

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

Larry Wisser and Cathleen Wisser,

Plaintiffs,

v.

Bruce Brown, et all,

Defendants.

Case No. 5:21-cv-5017-EGS

Motion for Extension of Time to Answer Defendants' Motion to Dismiss

1. Defendants filed a Motion to Dismiss on March 23, 2022 to Plaintiffs' Amended Complaint.
2. By Order of this Honorable Court on April 18, 2022, the deadline to Answer was extended until today, May 16, 2022.
3. Until today, Plaintiffs were *pro se* in this matter.
4. Undersigned counsel was retained first thing this morning and has not had time to read the relevant documents or become fully acquainted with the facts and defenses in this case.
5. Counsel spoke with Mr. Matthew Howatt, attorney for the Defendants, by phone this morning, who does not oppose this request for extension of time.
6. Undersigned counsel does not expect any additional need for extension of time in responding to this Motion to Dismiss and believes no party will be prejudiced by it being granted.

WHEREFORE, Plaintiff requests an extension of time for 30 days to respond to the Motion to Dismiss.

Respectfully submitted,

CORNERSTONE LAW FIRM, LLC

/s/ Joel A. Ready

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